Honorable Samuel J. Steiner
Chapter 11

Hearing Date:	November 12, 2010
Hearing Time:	9:30 a.m.
Hearing Place:	Seattle, WA
Response Date:	November 5, 2010

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

In re ADAM R. GROSSMAN, Debtor.	No. 10-19817-SJS DECLARATION OF TEREZA SIMONYAN IN SUPPORT OF MOTION FOR ORDER FOR APPOINTMENT OF A CHAPTER 11 TRUSTEE

Tereza Simonyan declares as follows:

1. I am one of the attorneys of record for Jill Borodin ("Rabbi Borodin"), a creditor in the above Chapter 11 case and the creditor moving for an order appointing a Chapter 11 Trustee. I am over the age of 18 years, have personal knowledge of the facts stated herein, and am competent to testify to them.

2. Attached as **Exhibit A** is a true and correct copy of the docket report in the dismissed Chapter 11 case filed by the Debtor on June 25, 2010.

3. Attached as **Exhibit B** is a true and correct copy of the docket report in the dismissed Chapter 11 case filed by the Debtor on July 27, 2010.

CROCKER LAW GROUP PLLC
720 Olive Way, Suite 1000, Seattle, WA 98101
P) 206-624-9894 F) 206-624-8598
www.crockerlaw.com

4. Attached as **Exhibit C** is a true and correct copy of the Debtor's bankruptcy schedules in the current Chapter 11 case.

5. Attached as **Exhibit D** is a true and correct copy of the email sent from William Courshon to the Debtor and the Debtor's attorney on October 20, 2010.

6. Attached as **Exhibit E** is a true and correct copy of a Motion to Compel Discovery filed in the State Court dissolution proceeding.

7. Attached as **Exhibit F** is a true and correct copy of a Motion for Disgorgement of Fees filed by Rabbi Borodin, currently pending in this Court.

8. Attached as **Exhibit G** is a true and correct copy of the standing Temporary Order entered by the Washington Superior Court for King County, in the Debtor's dissolution proceeding, Case Number 09-3-02955-9 SEA.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

DATED this 22nd day of October, 2010 at Seattle, Washington.

/s/Tereza Simonyan
Tereza Simonyan

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P) 206-624-9894 F) 206-624-8598
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DebtEd, FeeDueINST, Repeat, SmBus, CLOSED

U.S. Bankruptcy Court
Western District of Washington (Seattle)
Bankruptcy Petition #: 10-17334-KAO

Date filed: 06/25/2010
Date terminated: 08/13/2010
Debtor dismissed: 07/22/2010

Assigned to: Karen A. Overstreet
Chapter 11
Voluntary
Asset

Debtor disposition: Dismissed for Other Reason

Debtor
Adam R Grossman
5766 27th Ave NE
Seattle, WA 98105
SSN / ITIN: xxx-xx-7951

represented by **Adam R Grossman**
PRO SE

US Trustee
United States Trustee
700 Stewart St Ste 5103
Seattle, WA 98101
(206) 553-2000

represented by **William L. Courshon**
700 Stewart St Ste 5103
Seattle, WA 98101
206-553-2000
Email:
bill.l.courshon@usdoj.gov

Filing Date	#	Docket Text
06/25/2010	1	Chapter 11 Voluntary Petition . Statement of Financial Affairs due 7/9/2010. Schedules A-J due 7/9/2010. Chapter 11 Current Monthly Income Form 22B Due 7/9/2010. Summary of schedules due 7/9/2010.Incomplete Filings due by 7/9/2010, Filed by Adam R Grossman (USBC Staff - Heuerman, Mari) Additional attachment(s) added on 6/28/2010 (USBC Staff - Jones, John). (Entered: 06/25/2010 at 16:34:11)
06/25/2010		Receipt of Chapter 11 Installment Filing Fee - $0.00 by MH. Receipt Number 00165312. (admin) (Entered: 06/25/2010 at 22:05:48)
06/25/2010	2	Social Security Number(s) of Debtor(s) Submitted. PDF only viewable by court. Filed by Adam R Grossman . (USBC Staff - Jones, John) (Entered: 06/28/2010 at 10:05:37)
		Application to Pay Filing Fees in Installments . . Filed by Adam R Grossman (USBC Staff - Jones, John) (Entered: 06/28/2010 at

06/28/2010	3	10:06:22)
06/28/2010		ORDER Granting Payment of Filing Fee in Installments: Entry of an order of discharge will be held in abeyance until filing fees are paid in full. Mark L. Hatcher, Clerk . Final Installment Payment due by 10/25/2010. (USBC Staff - Jones, John) (Entered: 06/28/2010 at 10:09:37)
06/28/2010	4	Notice of Filing Fee Installment Payments . (USBC Staff - Jones, John) (Entered: 06/28/2010 at 10:09:52)
06/28/2010	5	Notice of Deadline for Schedules, Statements and Lists. Missing: Statement of Current Monthly Income(Means Test), Schedules A-J, Summary and Statistical Summary, and Statement of Financial Affairs. (USBC Staff - Jones, John) (Entered: 06/28/2010 at 10:10:57)
06/28/2010	6	Notice of Deficiency for Minimum Filing Requirements. Missing: Exhibit D(Block 1 marked but no certificate attached as stated), Certificate of Credit Counseling, or Application for Extension of Time to Complete Credit Counseling, or Motion for Waiver of Credit Counseling. Inadequate Filing due: 7/6/2010. (USBC Staff - Jones, John) (Entered: 06/28/2010 at 10:12:53)
06/28/2010	7	341 Meeting of Creditors Notice Sent to BNC for Mailing . (USBC Staff - Jones, John) (Entered: 06/28/2010 at 10:13:37)
06/28/2010	8	Notice of Appearance Filed by William L. Courshon on behalf of United States Trustee. (Courshon, William) (Entered: 06/28/2010 at 10:22:49)
06/28/2010	9	Meeting of Creditors for Individual Filed by United States Trustee. With 341(a) meeting to be held on 8/4/2010 at 02:30 PM at US Courthouse, Room 4107 (341 Meetings) Last day to oppose dischargeability is 10/1/2010. Last day to oppose discharge of debtor will be set at a later time. (UST Staff - Park, Yoon) (Entered: 06/28/2010 at 11:35:20)
06/28/2010	10	341 Meeting of Creditors Notice Sent to BNC for Mailing . (USBC Staff - Isreal, Sandra) (Entered: 06/28/2010 at 12:19:51)
06/30/2010	11	BNC Certificate of Mailing - Meeting of Creditors (Related document(s) 7 341 Meeting of Creditors Sent to BNC for Mailing). Service Date 06/30/2010. (Admin.) (Entered: 06/30/2010 at 21:40:33)
		BNC Certificate of Mailing - Meeting of Creditors (Related

06/30/2010	12	document(s) 10 341 Meeting of Creditors Sent to BNC for Mailing). Service Date 06/30/2010. (Admin.) (Entered: 06/30/2010 at 21:40:33)
06/30/2010	13	BNC Certificate of Notice (Related document(s) 6 Notice of Deficiency of Filing Requirements). Service Date 06/30/2010. (Admin.) (Entered: 06/30/2010 at 21:40:33)
06/30/2010	14	BNC Certificate of Notice (Related document(s) 6 Notice of Deficiency of Filing Requirements). Service Date 06/30/2010. (Admin.) (Entered: 06/30/2010 at 21:40:33)
06/30/2010	15	BNC Certificate of Notice (Related document(s) 5 Notice of Deadline for Schedules, Statements and Lists). Service Date 06/30/2010. (Admin.) (Entered: 06/30/2010 at 21:40:33)
06/30/2010	16	BNC Certificate of Notice (Related document(s) 4 Notice of Filing Fee Installment Payments). Service Date 06/30/2010. (Admin.) (Entered: 06/30/2010 at 21:40:33)
06/30/2010	17	BNC Certificate of Notice (Related document(s) 6 Notice of Deficiency of Filing Requirements). Service Date 06/30/2010. (Admin.) (Entered: 06/30/2010 at 21:40:33)
07/19/2010		Receipt of Amendment Filing Fee - $26.00 by PR. Receipt Number 00166064. (admin) (Entered: 07/19/2010 at 22:05:24)
07/19/2010	20	Schedules (Amended Voluntary Petition to show Small Business, Schedules A-J, 20 Largest Creditors List filed). Filed by Adam R Grossman . (USBC Staff - Isreal, Sandra) Modified on 7/21/2010 to show correct file date (USBC Staff - Isreal, Sandra). (Entered: 07/21/2010 at 11:14:44)
07/19/2010	21	Certificate of Credit Counseling for Debtor . Filed by Adam R Grossman . (USBC Staff - Isreal, Sandra) (Entered: 07/21/2010 at 11:18:16)
07/19/2010	22	Chapter 11 Statement of Current Monthly Income (Form 22B). Filed by Adam R Grossman . (Related document(s) 1 Chapter 11 Voluntary Petition). (USBC Staff - Isreal, Sandra) (Entered: 07/21/2010 at 11:19:24)
07/20/2010	18	US Trustee Motion to Dismiss for Failure to File Schedules, Statements and/or Lists (Courshon, William) (Entered: 07/20/2010 at 10:21:13)
		Received UNSIGNED Order. Forwarded to Chambers for Judge's

07/20/2010	19	Signature . Filed by William L. Courshon on behalf of United States Trustee. (Related document(s) 18 US Trustee Motion to Dismiss for Failure to File Schedules Statements and or Lists Batch). (Courshon, William) (Entered: 07/20/2010 at 10:21:59)
07/21/2010	23	Notice of Deficiency for Minimum Filing Requirements Missing Small Business Balance Sheet, (CH 11 only), Small Business Statement Of Operations (CH 11 only), Small Business Cash Flow Statement (CH 11 only), Small Business Federal Tax Return (CH 11 only) . Inadequate Filing due: 7/28/2010. (USBC Staff - Isreal, Sandra) (Entered: 07/21/2010 at 12:41:06)
07/22/2010	24	Ex Parte ORDER Granting Motion to Dismiss Case for Failure to File Schedules or Statements (Related Doc # 18). Debtor Adam R Grossman dismissed. Signed on 7/22/2010. Prepare Notice of Dismissal 8/5/2010. Case Can Close: 8/12/2010. . (USBC Staff - Isreal, Sandra) (Entered: 07/22/2010 at 08:19:48)
07/23/2010	25	BNC Certificate of Notice (Related document(s) 23 Notice of Deficiency of Filing Requirements). Service Date 07/23/2010. (Admin.) (Entered: 07/23/2010 at 21:50:05)
07/24/2010	26	BNC Certificate of Notice (Related document(s) 24 Order on Motion to Dismiss Case for Failure to File Schedules or Statements). Service Date 07/24/2010. (Admin.) (Entered: 07/24/2010 at 21:32:23)
07/27/2010	27	Motion to Vacate Order of Dismissal. Filed by Adam R Grossman (USBC Staff - Kinch, Jim) (Entered: 07/28/2010 at 17:01:27)
07/27/2010	28	Letter From Debtor to Judge: Motion to Vacate Dismissal . (USBC Staff - Isreal, Sandra) (Entered: 07/29/2010 at 10:28:17)
07/29/2010	29	Letter From Chambers To: Debtor Re: Motion to Vacate Dismissal (Related document(s) 28 Letter From Attorney to Judge). (USBC Staff - Isreal, Sandra) (Entered: 07/29/2010 at 14:42:33)
07/31/2010	30	BNC Certificate of Notice (Related document(s) 29 Letter From Chambers). Service Date 07/31/2010. (Admin.) (Entered: 07/31/2010 at 21:35:44)
07/31/2010	31	BNC Certificate of Notice (Related document(s) 29 Letter From Chambers). Service Date 07/31/2010. (Admin.) (Entered: 07/31/2010 at 21:35:44)

08/02/2010	32	Schedules (Small Business Balance Sheet, Small Business Cash Flow Statement, Small Business Statement Of Operations, Small Business Federal Tax Return). Filed by Adam R Grossman . (USBC Staff - Isreal, Sandra) (Entered: 08/02/2010 at 13:23:24)
08/07/2010	33	Request for Special Notice. Filed by GE Money Bank.(Recovery Management Systems Corp) (Entered: 08/07/2010 at 06:09:30)
08/09/2010	34	Notice of Dismissal (Related document(s) 24 Order on Motion to Dismiss Case for Failure to File Schedules or Statements). (USBC Staff - Isreal, Sandra) (Entered: 08/09/2010 at 13:13:10)
08/11/2010	35	BNC Certificate of Notice (Related document(s) 34 Notice of Dismissal). Service Date 08/11/2010. (Admin.) (Entered: 08/11/2010 at 21:48:57)
08/13/2010		CLOSED CASE. Order Closing Case. An order dismissing has been entered by the Court, and notice of the dismissal has been given to the debtor(s) and all creditors and all other required documentation having been entered; therefore, IT IS ORDERED that the within case be and the same is hereby closed . Mark L. Hatcher, Clerk . (USBC Staff - Isreal, Sandra) (Entered: 08/13/2010 at 15:46:53)

PACER Service Center			
Transaction Receipt			
10/22/2010 11:51:53			
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Description:	Docket Report	**Search Criteria:**	10-17334-KAO Fil or Ent: filed Doc From: 0 Doc To: 99999999 Term: included Links : included Format: html
Billable Pages:	3	**Cost:**	0.24

DebtEd, CounDue, FeeDueINST, Repeat, CLOSED

U.S. Bankruptcy Court
Western District of Washington (Seattle)
Bankruptcy Petition #: 10-18671-KAO

Date filed: 07/27/2010
Date terminated: 09/01/2010
Debtor dismissed: 08/10/2010

Assigned to: Karen A. Overstreet
Chapter 11
Voluntary
Asset

Debtor disposition: Dismissed for Failure to File Information

Debtor
Adam R Grossman
5766 39th Ave NE
Seattle, WA 98105
SSN / ITIN: xxx-xx-7951

represented by **Adam R Grossman**
PRO SE

US Trustee
United States Trustee
700 Stewart St Ste 5103
Seattle, WA 98101
(206) 553-2000

represented by **William L. Courshon**
700 Stewart St Ste 5103
Seattle, WA 98101
206-553-2000
Email: bill.l.courshon@usdoj.gov

Filing Date	#	Docket Text
07/27/2010	1	Chapter 11 Voluntary Petition . Schedule A due 8/10/2010. Schedule B due 8/10/2010. Schedule D due 8/10/2010. Schedule E due 8/10/2010. Schedule F due 8/10/2010. Schedule G due 8/10/2010. Schedule H due 8/10/2010. Schedule I due 8/10/2010. Schedule J due 8/10/2010. Statement of Financial Affairs due 8/10/2010. Summary of schedules due 8/10/2010.Incomplete Filings due by 8/10/2010, Filed by Adam R Grossman (USBC Staff - Brown, Ethel) Additional attachment(s) added on 7/28/2010 (USBC Staff - Tamayao, Cyndi). Modified on 7/28/2010 (USBC Staff - Tamayao, Cyndi). (Entered: 07/27/2010 at 14:16:12)
07/27/2010		Receipt of Chapter 11 Installment Filing Fee - $0.00 by EB. Receipt Number 00166390. (admin) (Entered: 07/27/2010 at 22:05:17)
		Social Security Number(s) of Debtor(s) Submitted. PDF only

07/27/2010	2	viewable by court. Filed by Adam R Grossman . (USBC Staff - Tamayao, Cyndi) (Entered: 07/28/2010 at 09:56:03)
07/27/2010	3	Application to Pay Filing Fees in Installments . . Filed by Adam R Grossman (USBC Staff - Tamayao, Cyndi) (Entered: 07/28/2010 at 09:56:55)
07/28/2010		ORDER Granting Payment of Filing Fee in Installments: Entry of an order of discharge will be held in abeyance until filing fees are paid in full. Mark L. Hatcher, Clerk . Final Installment Payment due by 11/24/2010. (USBC Staff - Tamayao, Cyndi) (Entered: 07/28/2010 at 09:57:45)
07/28/2010	4	Notice of Deadline for Schedules, Statements and Lists . (USBC Staff - Tamayao, Cyndi) Missing Schedules A, B, D-J, Summary & Statistical Summary, Statement of Financial Affairs, Means Test & List of 20 Largest Unsecured Creditors. (Entered: 07/28/2010 at 10:03:19)
07/28/2010	5	Notice of Deficiency for Minimum Filing Requirements . Inadequate Filing due: 8/4/2010. (USBC Staff - Tamayao, Cyndi) Missing List of Creditors, Certificate of Credit Counseling or Application for Extension or Waiver, Small Business Balance Sheet, Cash Flow Statement, Statement of Operations & Federal Tax Return. (Entered: 07/28/2010 at 10:06:15)
07/28/2010	6	Notice of Filing Fee Installment Payments . (USBC Staff - Tamayao, Cyndi) (Entered: 07/28/2010 at 10:10:54)
07/30/2010	7	BNC Certificate of Notice (Related document(s) 5 Notice of Deficiency of Filing Requirements). Service Date 07/30/2010. (Admin.) (Entered: 07/30/2010 at 21:50:49)
07/30/2010	8	BNC Certificate of Notice (Related document(s) 5 Notice of Deficiency of Filing Requirements). Service Date 07/30/2010. (Admin.) (Entered: 07/30/2010 at 21:50:49)
07/30/2010	9	BNC Certificate of Notice (Related document(s) 4 Notice of Deadline for Schedules, Statements and Lists). Service Date 07/30/2010. (Admin.) (Entered: 07/30/2010 at 21:50:49)
07/30/2010	10	BNC Certificate of Notice (Related document(s) 6 Notice of Filing Fee Installment Payments). Service Date 07/30/2010. (Admin.) (Entered: 07/30/2010 at 21:50:49)
		BNC Certificate of Notice (Related document(s) 5 Notice of Deficiency of Filing Requirements). Service Date 07/30/2010.

07/30/2010	11	(Admin.) (Entered: 07/30/2010 at 21:50:49)
08/04/2010	12	Notice of Appearance Filed by William L. Courshon on behalf of United States Trustee. (Courshon, William) (Entered: 08/04/2010 at 12:30:28)
08/09/2010	13	Received UNSIGNED Order--"ORDER Dismissing Case for Failure to meet minimum filing requirements, Missing Master Mailing Lists, Small Business Balance Sheet, Cash Flow Statement, Statement of Operations & Federal Tax Return." Forwarded to Chambers for Judge's Signature . (USBC Staff - Cacho, Renato) (Entered: 08/09/2010 at 15:02:10)
08/10/2010	14	ORDER Dismissing Case for Failure to meet minimum filing requirements, Missing Master Mailing Lists, Small Business Balance Sheet, Cash Flow Statement, Statement of Operations & Federal Tax Return." . Prepare Notice of Dismissal 8/24/2010. Case Can Close: 8/31/2010. (USBC Staff - Cacho, Renato) (Entered: 08/10/2010 at 10:30:01)
08/12/2010	15	BNC Certificate of Notice (Related document(s) 14 Order Dismissing Case). Service Date 08/12/2010. (Admin.) (Entered: 08/12/2010 at 21:40:34)
08/13/2010	16	Request for Special Notice. Filed by GE Money Bank.(Recovery Management Systems Corp) (Entered: 08/13/2010 at 10:07:09)
08/26/2010	17	Notice of Dismissal (Related document(s) 14 Order Dismissing Case). (USBC Staff - Cacho, Renato) (Entered: 08/26/2010 at 11:58:27)
08/28/2010	18	BNC Certificate of Notice (Related document(s) 17 Notice of Dismissal). Service Date 08/28/2010. (Admin.) (Entered: 08/28/2010 at 21:32:52)
09/01/2010		CLOSED CASE. Order Closing Case. An order dismissing has been entered by the Court, and notice of the dismissal has been given to the debtor(s) and all creditors and all other required documentation having been entered; therefore, IT IS ORDERED that the within case be and the same is hereby closed . Mark L. Hatcher, Clerk . (USBC Staff - Cacho, Renato) (Entered: 09/01/2010 at 12:32:49)

PACER Service Center			
Transaction Receipt			
10/22/2010 11:52:18			
PACER Login:	ck0056	**Client Code:**	borodin
Description:	Docket Report	**Search Criteria:**	10-18671-KAO Fil or Ent: filed Doc From: 0 Doc To: 99999999 Term: included Links : included Format: html
Billable Pages:	2	**Cost:**	0.16

B6A (Official Form 6A) (12/07)

In re Grossman, Adam R. Case No. 10-19817 (If known)

SCHEDULE A - REAL PROPERTY

Except as directed below, list all real property in which the debtor has any legal, equitable, or future interest, including all property owned as a co-tenant, community property, or in which the debtor has a life estate. Include any property in which the debtor holds rights and powers exercisable for the debtor's own benefit. If the debtor is married, state whether husband, wife, or both own the property by placing an "H," "W," "J," or "C" in the column labeled "Husband, Wife, Joint, or Community." If the debtor holds no interest in real property, write "None" under "Description and Location of Property."

Do not include interests in executory contracts and unexpired leases on this schedule. List them in Schedule G - Executory Contracts and Unexpired Leases.

If an entity claims to have a lien or hold a secured interest in any property, state the amount of the secured claim. See Schedule D. If no entity claims to hold a secured interest in the property, write "None" in the column labeled "Amount of Secured Claim."

If the debtor is an individual or if a joint petition is filed, state the amount of any exemption claimed in the property only in Schedule C - Property Claimed as Exempt.

DESCRIPTION AND LOCATION OF PROPERTY	NATURE OF DEBTOR'S INTEREST IN PROPERTY	HUSBAND, WIFE, JOINT OR COMMUNITY	CURRENT VALUE OF DEBTOR'S INTEREST IN PROPERTY, WITHOUT DEDUCTING SECURED CLAIM OR EXEMPTION	AMOUNT OF SECURED CLAIM
6821 - 39th Ave. NE Seattle, WA 98115	Fee simple.	C	$605,000	$605,000
1679 Strause Lane Redding, CA 96003	Fee simple.	H	$202,500	$182,258
773 Metro Way Redding, CA 96003	Fee simple.	H	$210,500	$166,000
20710 Glennview Dr. Cottonwood, CA	Fee simple.	H	$259,000	$290,000
		Total of This Page ▶	$1,277,000	
		Total of All Pages ▶	$1,277,000	

(Report also on Summary of Schedules.)

Grossman

MacForms (509) 535-4382

B6B (Official Form 6B) (12/07)

In re Grossman, Adam R. Case No. 10-19817 (If known)

Debtor/Codebtor

SCHEDULE B - PERSONAL PROPERTY

Except as directed below, list all personal property of the debtor of whatever kind. If the debtor has no property in one or more of the categories, place an "x" in the appropriate position in the column labeled "None." If additional space is needed in any category, attach a separate sheet properly identified with the case name, case number, and the number of the category. If the debtor is married, state whether husband, wife, or both own the property by placing an "H," "W," "J," or "C" in the column labeled "Husband, Wife, Joint, or Community." If the debtor is an individual or a joint petition is filed, state the amount of any exemptions claimed only in Schedule C - Property Claimed as Exempt.

Do not list interests in executory contracts and unexpired leases on this schedule. List them in Schedule G - Executory Contracts and Unexpired Leases.

If the property is being held for the debtor by someone else, state that person's name and address under "Description and Location of Property." In providing the information requested in this schedule, do not include the name or address of a minor child. Simply state "a minor child."

TYPE OF PROPERTY	NONE	DESCRIPTION AND LOCATION OF PROPERTY	HUSBAND, WIFE, JOINT OR COMMUNITY	CURRENT VALUE OF DEBTOR'S INTEREST IN PROPERTY, WITH-OUT DEDUCTING ANY SECURED CLAIM OR EXEMPTION
1. Cash on hand.		Cash	H	$500
2. Checking, savings or other financial accounts, certificates of deposit, or shares in banks, savings and loan, thrift, building and loan, and homestead associations, or credit unions, brokerage houses, or cooperatives.		Chase checking account at 7600 - 35th Ave. NE, Seattle, WA 98115	C	$0
		Wells Fargo checking account 9501 - 35th Ave. NE Seattle, WA 98115	C	$0
3. Security deposits with public utilities, telephone companies, landlords, and others.	X			
4. Household goods and furnishings, including audio, video, and computer equipment.		Household goods and furninshings	C	$3,000
5. Books; pictures and other art objects; antiques; stamp, coin, record, tape, compact disc, and other collections or collectables.		Books and pictures.	C	$1,000
6. Wearing apparel.		Clothing and shoes.	H	$1,000
7. Furs and jewelry.	X			
8. Firearms and sports, photographic, and other hobby equipment.		S&W .38 revolver (no access by Debtor; stored by 3rd party)		$250
		Electronics, routers, switches, used computer drives & external drives (hobby equipmment)		$900

In re Grossman, Adam R. Case No. 10-19817 (If known)

SCHEDULE B - PERSONAL PROPERTY
(Continuation Sheet)

TYPE OF PROPERTY	NONE	DESCRIPTION AND LOCATION OF PROPERTY	HUSBAND, WIFE, JOINT OR COMMUNITY	CURRENT VALUE OF DEBTOR'S INTEREST IN PROPERTY, WITH-OUT DEDUCTING ANY SECURED CLAIM OR EXEMPTION
9. Interests in insurance policies. Name insurance company of each policy and itemize surrender or refund value of each.	X			
10. Annuities. Itemize and name each issuer.	X			
11. Interests in an education IRA as defined in 26 U.S.C. § 530(b)(1) or under a qualified State tuition plan as defined in 26 U.S.C. § 529(b)(1). Give particulars. (File separately the record(s) of any such interest (s). 11 U.S.C. § 521(c); Rule 1007(b)).	X			
12. Interests in IRA, ERISA, Keogh, or other pension or profit sharing plans. Give particulars.		403B with Joint Retirement Board One Penn Plaza, Suite 1515 New York, NY 10119	C	$210,000
13. Stock and interests in incorporated and unincorporated businesses. Itemize.		See attachment.	C	$0
14. Interests in partnerships or joint ventures. Itemize.		Terrington Davies Tanager Fund LP 4001 Kennett Pike Ste. 134 Greenville, DE 1987 (negative value due to estimated regulatory costs to close business)	C	<$15,000>
15. Government and corporate bonds and other negotiable and nonnegotiable instruments.	X			
16. Accounts receivable.	X			
17. Alimony, maintenance, support, and property settlements to which the debtor is or may be entitled. Give particulars.	X			

In re Grossman, Adam R. Case No. 10-19817
(If known)

SCHEDULE B - PERSONAL PROPERTY
(Continuation Sheet)

TYPE OF PROPERTY	NONE	DESCRIPTION AND LOCATION OF PROPERTY	HUSBAND, WIFE, JOINT OR COMMUNITY	CURRENT VALUE OF DEBTOR'S INTEREST IN PROPERTY, WITH-OUT DEDUCTING ANY SECURED CLAIM OR EXEMPTION
18. Other liquidated debts owing debtor including tax refunds. Give particulars.	X			
19. Equitable or future interests, life estates, and rights or powers exercisable for the benefit of the debtor other than those listed in Schedule of Real Property.	X			
20. Contingent and noncontingent interests in estate of a decedent, death benefit plan, life insurance policy, or trust.		Trust holding property at 868 - Montcrest Drive, Redding CA 96003. Trust beneficiaries are Debtor & Debtor's spouse.	C	$214,000
21. Other contingent and unliquidated claims of every nature, including tax refunds, counterclaims of the debtor, and rights to setoff claims. Give estimated value of each.	X			
22. Patents, copyrights, and other intellectual property. Give particulars.	X			
23. Licenses, franchises, and other general intangibles. Give particulars.	X			
24. Customer lists or other compilations containing personally identifiable information (as defined in 11 U.S.C. § 101(41A)) in customer lists or similar compilations provided to the debtor by individuals in connection with obtaining a product or service from the debtor primarily for personal, family, or household purposes.	X			
25. Automobiles, trucks, trailers, and other vehicles and accessories.		2005 Chevrolet Malibu with 29,500 Miles value based on kbb.com ($7,325) (Vehicle in poor condition, damage estimated @ $3,400).	C	$3,925

In re Grossman, Adam R. Case No. 10-19817
(If known)

SCHEDULE B - PERSONAL PROPERTY
(Continuation Sheet)

TYPE OF PROPERTY	NONE	DESCRIPTION AND LOCATION OF PROPERTY	HUSBAND, WIFE, JOINT OR COMMUNITY	CURRENT VALUE OF DEBTOR'S INTEREST IN PROPERTY, WITHOUT DEDUCTING ANY SECURED CLAIM OR EXEMPTION
26. Boats, motors, and accessories.	X			
27. Aircraft and accessories.	X			
28. Office equipment, furnishings, and supplies.		Office desk, office supplies, computer equipment, and telephones.		$2,500
29. Machinery, fixtures, equipment, and supplies used in business.	X			
30. Inventory.	X			
31. Animals.	X			
32. Crops - growing or harvested. Give particulars.	X			
33. Farming equipment and implements.	X			

In re Grossman, Adam R. Case No. 10-19817 (If known)

SCHEDULE B - PERSONAL PROPERTY
(Continuation Sheet)

	NONE	DESCRIPTION AND LOCATION OF PROPERTY	HUSBAND, WIFE, JOINT OR COMMUNITY	CURRENT VALUE OF DEBTOR'S INTEREST IN PROPERTY, WITH-OUT DEDUCTING ANY SECURED CLAIM OR EXEMPTION
34. Farm supplies, chemicals, and feed.	X			
35. Other personal property of any kind not already listed. Itemize.	X			
		Total of Continuation Sheet		

__________continuation sheets attached Total ▶ $ 422,075
(Include amounts from any continuation sheets attached. Report total also on Summary of Schedules.)

In re Grossman, Adam R. Case No. 10-19817 (If known)

Debtor/Codebtor

SCHEDULE C - PROPERTY CLAIMED AS EXEMPT

Debtor claims the exemptions to which debtor is entitled under:
(Check one box)

☐ 11 U.S.C. § 522(b)(2):
☒ 11 U.S.C. § 522(b)(3):

☐ Check if debtor claims a homestead exemption that exceeds $136,875

DESCRIPTION OF PROPERTY	SPECIFY LAW PROVIDING EACH EXEMPTION	VALUE OF CLAIMED EXEMPTION	CURRENT VALUE OF PROPERTY WITHOUT DEDUCTING EXEMPTION
Electronics, routers, switches, used computer drives & external drives	6.15.010(3)(b)	$900	$900
Clothing and shoes.	6.15.010(1)	$1,000	$1,000
Books and and pictures.	6.15.010(2)	$1,000	$1,000
Household goods and furnishings	6.15.010(3)(a)	$2,700	$3,000
Household goods and furnishings (cont'd)	6.15.010(3)(b)	$300	
2005 Chevrolet Malibu vehicle	6.15.010(3)(c)	$2,500	$3,925
2005 Chevrolet Malibu vehicle (cont'd)	6.15.010(3)(b)	$800	
Office furniture and supplies	6.15.010(4)(b)	$2,500	$2,500
Smith Weston .38 revolver	38.49.150	$250	$250
403(b) at Joint Retirement Board	6.15.020(3)	$210,000	$210,000

B6D (Official Form 6D) (12/07)

In re Debtor Case No. ____________ (if known)

SCHEDULE D – CREDITORS HOLDING SECURED CLAIMS

State the name, mailing address, including zip code, and last four digits of any account number of all entities holding claims secured by property of the debtor as of the date of filing of the petition. The complete account number of any account the debtor has with the creditor is useful to the trustee and the creditor and may be provided if the debtor chooses to do so. List creditors holding all types of secured interests such as judgment liens, garnishments, statutory liens, mortgages, deeds of trust, and other security interests.

List creditors in alphabetical order to the extent practicable. If a minor child is a creditor, indicate that by stating "a minor child" and donot disclose the child's name. See 11 U.S.C. § 112. If "a minor child" is stated, also include the name, address, and legal relationship to the minor child of a person described in Fed. R. Bankr. P. 1007(m). If all secured creditors will not fit on this page, use the continuation sheet provided.

If any entity other than a spouse in a joint case may be jointly liable on a claim, place an "X" in the column labeled "Codebtor," include the entity on the appropriate schedule of creditors, and complete Schedule H – Codebtors. If a joint petition is filed, state whether the husband, wife, both of them, or the marital community may be liable on each claim by placing an "H," "W," "J," or "C" in the column labeled "Husband, Wife,Joint, or Community."

If the claim is contingent, place an "X" in the column labeled "Contingent." If the claim is unliquidated, place an "X" in the column labeled "Unliquidated." If the claim is disputed, place an "X" in the column labeled "Disputed." (You may need to place an "X" in more than one of these three columns.)

Total the columns labeled "Amount of Claim Without Deducting Value of Collateral" and "Unsecured Portion, if Any" in the boxes labeled "Total(s)" on the last sheet of the completed schedule. Report the total from the column labeled "Amount of Claim Without Deducting Value of Collateral" also on the Summary of Schedules and, if the debtor is an individual with primarily consumer debts, report the total from the column labeled "Unsecured Portion, if Any" on the Statistical Summary of Certain Liabilities and Related Data.

☐ Check this box if debtor has no creditors holding secured claims to report on this Schedule D.

CREDITOR'S NAME, MAILING ADDRESS INCLUDING ZIP CODE AND ACCOUNT NUMBER *(See instructions above.)*	CODEBTOR	HUSBAND, WIFE, JOINT OR COMMUNITY	DATE CLAIM WAS INCURRED, NATURE OF LIEN, AND DESCRIPTION AND VALUE OF PROPERTY SUBJECT TO LIEN	CONTINGENT	UNLIQUIDATED	DISPUTED	AMOUNT OF CLAIM WITHOUT DEDUCTING VALUE OF COLLATERAL	UNSECURED PORTION, IF ANY
ACCT NO. California Franchise Tax Board PO Box 942857 Sacramento, CA 94257-0500		C	2006 Tax lien for property on: 1679 Strause Lane, Redding, CA 96003 VALUE $ 202,500				$9,500	$0
ACCT NO. Wells Fargo Equityline TM PO Box 31557 Billings, MT 59107		C	Date: 6/2007 Secured line of credit on: 1679 Strause Lane, Redding, CA 96003 VALUE $ 202,500				$87,522	$0
ACCT NO. Wells Fargo Equity Resources 3476 State View Blvd. Fort Mill, SC 29715		H	Date: 01/2003 Mortgage on: 1679 Strause Lane, Redding, CA 96003 VALUE $ 202,500				$66,736	$0

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B6D (Official Form 6D) (12/07)—Cont.

In re Grossman, Adam R. Case No. ______________

(if known)

SCHEDULE D— CREDITORS HOLDING SECURED CLAIMS

CREDITOR'S NAME, MAILING ADDRESS INCLUDING ZIP CODE AND ACCOUNT NUMBER *(See instructions above.)*	CODEBTOR	HUSBAND, WIFE, JOINT OR COMMUNITY	DATE CLAIM WAS INCURRED, NATURE OF LIEN, AND DESCRIPTION AND VALUE OF PROPERTY SUBJECT TO LIEN	CONTINGENT	UNLIQUIDATED	DISPUTED	AMOUNT OF CLAIM WITHOUT DEDUCTING VALUE OF COLLATERAL	UNSECURED PORTION, IF ANY
			Total (Use only on last page) ▶				$163,758	$0
							(Report total also on Summary of Schedules)	(If applicable, report also on Statistical Summary of Certain Liabilities and Related Data.)

B6E (Official Form 6E) (12/07)

Debtor

In re Grossman, Adam R. Case No. 10-19817

(if known)

SCHEDULE E - CREDITORS HOLDING UNSECURED PRIORITY CLAIMS

A complete list of claims entitled to priority, listed separately by type of priority, is to be set forth on the sheets provided. Only holders of unsecured claims entitled to priority should be listed in this schedule. In the boxes provided on the attached sheets, state the name, mailing address, including zip code, and last four digits of the account number, if any, of all entities holding priority claims against the debtor or the property of the debtor, as of the date of the filing of the petition. Use a separate continuation sheet for each type of priority and label each with the type of priority.

The complete account number of any account the debtor has with the creditor is useful to the trustee and the creditor and may be provided if the debtor chooses to do so. If a minor child is a creditor, indicate that by stating "a minor child" and do not disclose the child's name. See 11 U.S.C. § 112. If "a minor child" is stated, also include the name, address, and legal relationship to the minor child of a person described in Fed. R. Bankr. P. 1007(m).

If any entity other than a spouse in a joint case may be jointly liable on a claim, place an "X" in the column labeled "Codebtor," include theentity on the appropriate schedule of creditors, and complete Schedule H-Codebtors. If a joint petition is filed, state whether the husband, wife, both of them, or the marital community may be liable on each claim by placing an "H," "W," "J," or "C" in the column labeled "Husband, Wife, Joint, or Community." If the claim is contingent, place an "X" in the column labeled "Contingent." If the claim is unliquidated, place an "X" in the column labeled "Unliquidated." If the claim is disputed, place an "X" in the column labeled "Disputed." (You may need to place an "X" in more than one of these three columns.)

Report the total of claims listed on each sheet in the box labeled "Subtotals" on each sheet. Report the total of all claims listed on this Schedule E in the box labeled "Total" on the last sheet of the completed schedule. Report this total also on the Summary of Schedules.

Report the total of amounts entitled to priority listed on each sheet in the box labeled "Subtotals" on each sheet. Report the total of all amounts entitled to priority listed on this Schedule E in the box labeled "Totals" on the last sheet of the completed schedule. Individual debtors with primarily consumer debts who file a case under chapter 7 or 13 report this total also on the Statistical Summary of Certain Liabilities and Related Data.

Report the total of amounts not entitled to priority listed on each sheet in the box labeled "Subtotals" on each sheet. Report the total of all amounts not entitled to priority listed on this Schedule E in the box labeled "Totals" on the last sheet of the completed schedule. Individual debtors with primarily consumer debts who file a case under chapter 7 report this total also on the Statistical Summary of Certain Liabilities and Related Data.

[X] Check this box if debtor has no creditors holding unsecured priority claims to report on this Schedule E.

TYPES OF PRIORITY CLAIMS (Check the appropriate box(es) below if claims in that category are listed on the attached sheets)

[ ] **Domestic Support Obligations**

Claims for domestic support that are owed to or recoverable by a spouse, former spouse, or child of the debtor, or the parent, legal guardian, or responsible relative of such a child, or a governmental unit to whom such a domestic support claim has been assigned to the extent provided in 11 U.S.C. § 507(a)(1).

[ ] **Extensions of credit in an involuntary case**

Claims arising in the ordinary course of the debtor's business or financial affairs after the commencement of the case but before the earlier of the appointment of a trustee or the order for relief. 11 U.S.C. § 507(a)(3).

[ ] **Wages, salaries, and commissions**

Wages, salaries, and commissions, including vacation, severance, and sick leave pay owing to employees and commissions owing to qualifying independent sales representatives up to $10,950* per person earned within 180 days immediately preceding the filing of the original petition, or the cessation of business, whichever occurred first, to the extent provided in 11 U.S.C. § 507(a)(4).

[ ] **Contributions to employee benefit plans**

Money owed to employee benefit plans for services rendered within 180 days immediately preceding the filing of the original petition, or the cessation of business, whichever occurred first, to the extent provided in 11 U.S.C. § 507(a)(5).

[ ] **Certain farmers and fishermen**

Claims of certain farmers and fishermen, up to $5,400* per farmer or fisherman, against the debtor, as provided in 11 U.S.C. § 507(a)(6).

[ ] **Deposits by individuals**

Claims of individuals up to $2,425* for deposits for the purchase, lease, or rental of property or services for personal, family, or household use, that were not delivered or provided. 11 U.S.C. § 507(a)(7).

[ ] **Taxes and Certain Other Debts Owed to Governmental Units**

Taxes, customs duties, and penalties owing to federal, state, and local governmental units as set forth in 11 U.S.C. § 507(a)(8).

[ ] **Commitments to Maintain the Capital of an Insured Depository Institution**

Claims based on commitments to the FDIC, RTC, Director of the Office of Thrift Supervision, Comptroller of the Currency, or Board of Governors of the Federal Reserve System, or their predecessors or successors, to maintain the capital of an insured depository institution. 11 U.S.C. § 507 (a)(9).

[ ] **Claims for Death or Personal Injury While Debtor Was Intoxicated**

Claims for death or personal injury resulting from the operation of a motor vehicle or vessel while the debtor was intoxicated from using alcohol, a drug, or another substance. 11 U.S.C. § 507(a)(10).

* Amounts are subject to adjustment on April 1, 2010 and every three years thereafter with respect to cases commenced on or after the date of adjustment.

0 **continuation sheets attached**

B6F (Official Form 6F) (12/07)

Debtor

In re Grossman, Adam R. Case No. 10-19817

(if known)

SCHEDULE F— CREDITORS HOLDING UNSECURED NONPRIORITY CLAIMS

State the name, mailing address, including zip code, and last four digits of any account number, of all entities holding unsecured claims without priority against the debtor or the property of the debtor, as of the date of filing of the petition. The complete account number of any account the debtor has with the creditor is useful to the trustee and the creditor and may be provided if the debtor chooses to do so. If a minor child is a creditor, indicate that by stating "a minor child" and do not disclose the child's name. See 11 U.S.C. § 112. If "a minor child" is stated, also include the name, address, and legal relationship to the minor child of a person described in Fed. R. Bankr. P. 1007(m). Do not include claims listed in Schedules D and E. If all creditors will not fit on this page, use the continuation sheet provided.

If any entity other than a spouse in a joint case may be jointly liable on a claim, place an "X" in the column labeled "Codebtor," include the entity on the appropriate schedule of creditors, and complete Schedule H - Codebtors. If a joint petition is filed, state whether the husband, wife, both of them, or the marital community may be liable on each claim by placing an "H," "W," "J," or "C" in the column labeled "Husband, Wife, Joint, or Community."

If the claim is contingent, place an "X" in the column labeled "Contingent." If the claim is unliquidated, place an "X" in the column labeled "Unliquidated." If the claim is disputed, place an "X" in the column labeled "Disputed." (You may need to place an "X" in more than one of these three columns.)

Report the total of all claims listed on this schedule in the box labeled "Total" on the last sheet of the completed schedule. Report this total also on the Summary of Schedules and, if the debtor is an individual with primarily consumer debts filing a case under chapter 7, report this total also on the Statistica Summary of Certain Liabilities and Related Data..

☐ Check this box if debtor has no creditors holding unsecured claims to report on this Schedule F.

CREDITOR'S NAME, MAILING ADDRESS INCLUDING ZIP CODE, AND ACCOUNT NUMBER (See instructions above.)	CODEBTOR	HUSBAND, WIFE, JOINT OR COMMUNITY	DATE CLAIM WAS INCURRED AND CONSIDERATION FOR CLAIM. IF CLAIM IS SUBJECT TO SETOFF, SO STATE.	CONTINGENT	UNLIQUIDATED	DISPUTED	AMOUNT OF CLAIM
ACCT NO. Bank of America 4161 Piedmont Pkwy Greensboro, NC 27410		C	Credit Card				$36,297
ACCT NO. Chase Bank USA 800 Brooksedge Blvd. Westerville, OH 43081		H	Credit Card				$5,264
ACCT NO. Chase Bank USA 800 Brooksedge Blvd. Westerville, OH 43081		H	Credit Card				$1,582

Debtor

In re Grossman, Adam R. Case No. ____________ (if known)

SCHEDULE F – CREDITORS HOLDING UNSECURED NONPRIORITY CLAIMS

(Continuation Sheet)

CREDITOR'S NAME, MAILING ADDRESS INCLUDING ZIP CODE, AND ACCOUNT NUMBER (See instructions above.)	CODEBTOR	HUSBAND, WIFE, JOINT OR COMMUNITY	DATE CLAIM WAS INCURRED AND CONSIDERATION FOR CLAIM. IF CLAIM IS SUBJECT TO SETOFF, SO STATE.	CONTINGENT	UNLIQUIDATED	DISPUTED	AMOUNT OF CLAIM
ACCT NO. Chase Bank USA 800 Brooksedge Blvd. Westerville, OH 43081		C					$26,807
ACCT NO. CitiBank Student Loan PO Box 22876 Rochester, NY 14692		C	Student Loan				$37,753
ACCT NO. CitiBank Student Loan PO Box 22876 Rochester, NY 14692		C	Student Loan				$34,751
ACCT NO. Discover Card 12 Reads Way New Castle, DE 19720		C					$5,949
ACCT NO. Cindy Loegering PO Box 993115 Redding, CA 96099		C					$16,000

Debtor

In re Grossman, Adam R. Case No. ____________
(if known)

SCHEDULE F — CREDITORS HOLDING UNSECURED NONPRIORITY CLAIMS

(Continuation Sheet)

CREDITOR'S NAME, MAILING ADDRESS INCLUDING ZIP CODE, AND ACCOUNT NUMBER (See instructions above.)	CODEBTOR	HUSBAND, WIFE, JOINT OR COMMUNITY	DATE CLAIM WAS INCURRED AND CONSIDERATION FOR CLAIM. IF CLAIM IS SUBJECT TO SETOFF, SO STATE.	CONTINGENT	UNLIQUIDATED	DISPUTED	AMOUNT OF CLAIM
ACCT NO. Lyman Opie 60 Magazine St Cambridge, MA 02139		H					$65,000
ACCT NO. Sallie Mae 1002 Arthur Dr. Lynn Haven, FL 32444		C	Student loan				$66,443
ACCT NO. Abraham Wyner 1309 Sussex Rd Wynnewood, PA 19096		H					$10,000

Total ▶ $305,846

(Use only on last page of the completed Schedule F.)
(Report also on Summary of Schedules and, if applicable, on the Statistical Summary of Certain Liabilities and Related Data.)

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In re Grossman, Adam R. Case No. 10-19817 (If known)

SCHEDULE G - EXECUTORY CONTRACTS AND UNEXPIRED LEASES

Describe all executory contracts of any nature and all unexpired leases of real or personal property. Include any timeshare interests. State nature of debtor's interest in contract, i.e., "Purchaser," "Agent," etc. State whether debtor is the lessor or lessee of a lease. Provide the names and complete mailing addresses of all other parties to each lease or contract described. If a minor child is a party to one of the leases or contracts, state the child's initials and the name and address of the child's parent or guardian, such as "A.B., a minor child, by John Doe, guardian." Do not disclose the child's name. See, 11 U.S.C. §112 and Fed. R. Bankr. P. 1007(m).

☐ Check this box if debtor has no executory contracts or unexpired leases.

NAME AND MAILING ADDRESS, INCLUDING ZIP CODE, OF OTHER PARTIES TO LEASE OR CONTRACT	DESCRIPTION OF CONTRACT OR LEASE AND NATURE OF DEBTOR'S INTEREST, STATE, WHETHER LEASE IS FOR NONRESIDENTIAL REAL PROPERTY, STATE CONTRACT NUMBER OF ANY GOVERNMENT CONTRACT.
Peter Zieve 5766 - 2nd Ave. NE Seattle, WA 98105	Residential lease agreement. Debtor is lessor.

_________ continuation sheets attached

In re Grossman, Adam R. Case No. 10-19817 (If known)

SCHEDULE H - CODEBTORS

Provide the information requested concerning any person or entity, other than a spouse in a joint case, that is also liable on any debts listed by the debtor in the schedules of creditors. Include all guarantors and co-signers. If the debtor resides or resided in a community property state, commonwealth, or territory (including Alaska, Arizona, California, Idaho, Louisiana, Nevada, New Mexico, Puerto Rico, Texas, Washington, or Wisconsin) within the eight-year period immediately preceding the commencement of the case, identify the name of the debtor's spouse and of any former spouse who resides or resided with the debtor in the community property state, commonwealth, or territory. Include all names used by the nondebtor spouse during the eight years immediately preceding the commencement of this case. If a minor child is a codebtor or a creditor, state the child's initials and the name and address of the child's parent or guardian, such as "A.B., a minor child, by John Doe, guardian." Do not disclose the child's name. See, 11 U.S.C. §112 and Fed. R. Bankr. P. 1007(m).

[X] Check this box if debtor has no codebtors.

NAME AND ADDRESS OF CODEBTOR	NAME AND ADDRESS OF CREDITOR

B6I (Official Form 6I) (12/07)

In re _Grossman, Adam R.   Case No. 10-19817
(If known)

Debtor Codebtor

SCHEDULE I - CURRENT INCOME OF INDIVIDUAL DEBTOR(S)

The column labeled "Spouse" must be completed in all cases filed by joint debtors and by every married debtor, whether or not a joint petition is filed, unless the spouses are separated and a joint petition is not filed. Do not state the name of any minor child. The average monthly income calculated on this form may differ from the current monthly income calculated on From 22A, 22B, or 22C.

Debtor's Marital Status:	DEPENDENTS OF DEBTOR AND SPOUSE	
Married	RELATIONSHIP(S): Daughter, Daughter	AGE(S): 4, 4

Employment:	DEBTOR	SPOUSE
Occupation	Self-employed	
Name of Employer		
How long employed	20 years	
Address of Employer	5766 - 27th Ave. NE Seattle, WA 98105	

INCOME: (Estimate of average or projected monthly income at time case filed)	DEBTOR	SPOUSE
1. Monthly gross wages, salary, and commissions (Prorate if not paid monthly)	$	$
2. Estimate monthly overtime	$	$
3. SUBTOTAL	$	$
4. LESS PAYROLL DEDUCTIONS		
a. Payroll taxes and social security	$	$
b. Insurance	$	$
c. Union dues	$	$
d. Other (Specify):	$	$
5. SUBTOTAL OF PAYROLL DEDUCTIONS	$	$
6. TOTAL NET MONTHLY TAKE HOME PAY	$	$
7. Regular income from operation of business or profession or farm (Attach detailed statement)	$	$
8. Income from real property	$ 2,200.00	$
9. Interest and dividends	$	$
10. Alimony, maintenance or support payments payable to the debtor for the debtor's use or that of dependents listed above	$	$
11. Social security or government assistance (Specify):	$	$
12. Pension or retirement income	$	$
13. Other monthly income (Specify):	$	$
14. SUBTOTAL OF LINES 7 THROUGH 13	$ 2,200.00	$
15. AVERAGE MONTHLY INCOME (Add amounts shown on lines 6 and 14)	$ 2,200.00	$
16. COMBINED AVERAGE MONTHLY INCOME: (Combine column totals from line 15; if there is only one debtor repeat total reported on line 15)	$ 2,200.00	

(Report also on Summary of Schedules and, if applicable, on Statistical Summary of Certain Liabilities and Related Data)

17. Describe any increase or decrease in income reasonably anticipated to occur within the year following the filing of this document:

B6J (Official Form 6J) (12/07)

In re Grossman, Adam R. Case No. 10-19817

Debtor/Codebtor (if known)

SCHEDULE J - CURRENT EXPENDITURES OF INDIVIDUAL DEBTOR(S)

Complete this schedule by estimating the average or projected monthly expenses of the debtor and the debtor's family at time case filed. Prorate any payments made bi-weekly, quarterly, semi-annually, or annually to show monthly rate. The average monthly expenses calculated on this form may differ from the deductions from income allowed on Form 22A or 22C.

☐ Check this box if a joint petition is filed and debtor's spouse maintains a separate household. Complete a separate schedule of expenditures labeled "Spouse."

1.	Rent or home mortgage payment (include lot rented for mobile home)	$ 1,800.00
	Are real estate taxes included? Yes ____ No X	
	Is property insurance included? Yes X No ____	
2.	Utilities: a. Electricity and heating fuel	$ 125.00
	b. Water and sewer	$ 85.00
	c. Telephone	$ 50.00
	d. Other P.O. Box	$ 20.00
3.	Home maintenance (repairs and upkeep)	$ 80.00
4.	Food	$ 500.00
5.	Clothing	$ 100.00
6.	Laundry and dry cleaning	$ 40.00
7.	Medical and dental expenses	$ 100.00
8.	Transportation (not including car payments)	$ 275.00
9.	Recreation, clubs and entertainment, newspapers, magazines, etc.	$ 20.00
10.	Charitable contributions	$ 0.00
11.	Insurance (not deducted from wages or included in home mortgage payments)	
	a. Homeowner's or renter's	$ 0.00
	b. Life	$ 0.00
	c. Health	$ 0.00
	d. Auto	$ 0.00
	e. Other	$ 0.00
12.	Taxes (not deducted from wages or included in home mortgage payments) (Specify) Annual corporate fees (Delaware)	$ 20.00
13.	Installment payments: (In chapter 11, 12 and 13 cases, do not list payments to be included in the plan)	
	a. Auto	$ 0.00
	b. Other	$ 0.00
	c. Other	$ 0.00
14.	Alimony, maintenance, and support paid to others	$ 0.00
15.	Payments for support of additional dependents not living at your home	$ 0.00
16.	Regular expenses from operation of business, profession, or farm (attach detailed statement)	$ 1,955.41
17.	Other clothing fior kids ($150); visitation expenses (~$1,600)	$ 1,750.00
18.	AVERAGE MONTHLY EXPENSES (Total lines 1-17. Report also on Summary of Schedules and, if applicable, on the Statistical Summary of Certain Liabilities and Related Data.)	$ 6,920.41

19. Describe any increase or decrease in expenditures reasonably anticipated to occur within the year following the filing of this document:

20. STATEMENT OF MONTHLY NET INCOME

a.	Average monthly income from Line 15 of Schedule I	$ 2,200.00
b.	Average monthly expenses from, Line 18 above	$ 6,920.41
c.	Monthly net income (a. minus b.)	$ <4,720.41>

MacForms (509) 535-4382 Grossman

Tereza Simonyan

From: Courshon, Bill (USTP) [Bill.L.Courshon@usdoj.gov]
Sent: Wednesday, October 20, 2010 11:05 AM
To: 'matthew@mdolaw.com'
Cc: Maurer, Tara (USTP); Park, Yoon S. (USTP); tsimonyan@crockerlaw.com
Subject: RE: Adam R. Grossman, Case No. 10-19817-SJS - 341 Meeting Continued to 11/3/10 at 2:30 p.m.

Importance: High

Mr. O'Conner:

This is to confirm that the U.S. Trustee has agreed to a further continuance of the 341 meeting of creditors in the above-referenced chapter 11 case from today, 10/20/10 at 2:30 p.m., to **11/03/10 at 2:30 p.m.**, at your request due to illness, subject to the condition that the debtor provide all documents and information requested by the U.S. Trustee at the initial 341 meeting (on 9/28/10), as set forth below, **not later than 10/27/10**. To date, we have received nothing other than the debtor's proof of SSN. If the debtor fails to comply with these requests, the U.S. Trustee intends to file a motion to convert or dismiss the chapter 11 case. If you have any questions, please let me know.

Sincerely,

William L. Courshon
Attorney for the United States Trustee
700 Stewart Street, Suite 5103
Seattle, WA 98101-1271
Telephone: (206) 553-2000, ext. 252
Fax: (206) 553-2566
E-mail: Bill.L.Courshon@usdoj.gov

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shon, Bill (USTP)
ay, October 05, 2010 5:18 PM
v@mdolaw.com
Tara (USTP); Gunter, Karen (USTP)
Adam R. Grossman, Case No. 10-19817-SJS - 341 Meeting Follow-up

Mr. O'Conner:

To follow up on the debtor's section 341 meeting of creditors held 9/28/10, we have continued the meeting to **10/20/10 at 2:30 p.m.** to require the debtor to provide proof of SSN, amend schedules and statements, and provide additional documents and information. We requested at the 341 meeting that the debtor provide the following information and documents (**all due 10/12/10**):

1) Amend Schedule B to list the debtor's interest in the entities listed in SOFA #18, other members or partners, assets owned by those entities, etc.

2) Amend Schedule D to list secured debt on the Metro Way and Glennview Drive properties in California

3) Amend Schedule E to list any domestic support obligations. If the debtor has domestic support obligations, he will also be required to provide the notice required by Bankruptcy Code sections 1106(a)(8) and (c).

4) Amend Schedule F to list the $10,000 unsecured debt to the debtor's cousins, Jill and Brian Reynolds

5) Amend Schedule G to list leases with tenants on the Strause Lane and Metro Way properties

6) Amend Schedule H to list Ms. Borodin as a codebtor and to specify the claims on which she is a codebtor

7) Amend Schedule J to attach a breakdown of the debtor's business expenses of $1,955 per month (on line16)

8) Amend Statement of Financial Affairs ("SOFA") #4(a) to list dissolution proceedings with Ms. Borodin

9) Amend SOFA #18 to list the correct taxpayer ID numbers for each entity

10) Copies of documents (including any note(s), checks, deposit slips, bank statements, etc.) evidencing the $25,000 postpetition loan from Steven N. LeBlanc

11) Copies of bank statements for any accounts maintained by Cindy Pace-Loegering and/or Ace Property Management ("Ace") in which rents or other estate funds are deposited on behalf of the debtor for the 2 months before filing

12) Submit employment applications for debtor's counsel, special counsel in the dissolution proceedings, and Cindy Loegering and/or Ace (if applicable). Ace may not be eligible to be employed as a professional person under Bankruptcy Code section 327(a) because Ms. Loegering is listed on Schedule F as an unsecured creditor with a claim for $16,000.

13) D needs to file a Form B26 for the 3 LLCs (TD, TDCM, and Ptarmigan) and 1 limited partnership (Tanager Fund LP) listed on SOFA #18

14) Copy of the trust agreement for the 868 Montcrest Dr. Family Trust

15) Proof of umbrella insurance coverage

After we receive the requested documents and information, I will confirm with you whether the debtor still needs to appear at the continued section 341 meeting scheduled for 10/20/10 at 2:30 p.m.

Thank you for your cooperation. If you have any questions, please let me know.

Sincerely,

William L. Courshon
Attorney for the United States Trustee
700 Stewart Street, Suite 5103
Seattle, WA 98101-1271
Telephone: (206) 553-2000, ext. 252
Fax: (206) 553-2566
E-mail: Bill.L.Courshon@usdoj.gov

IN THE SUPERIOR COURT OF WASHINGTON
IN AND FOR KING COUNTY

In re the Marriage of: JILL IRINA BORODIN, Petitioner, and ADAM REED GROSSMAN, Respondent.	)	NO. 09-3-02955-9 SEA **MOTION TO COMPEL DISCOVERY**

I. MOTION TO COMPEL DISCOVERY

1. Relief Sought. Petitioner, by and through her attorney of record, Jennie R. Laird, of Michael W. Bugni & Associates, moves this Court, pursuant to Civil Rule 37(a), for an order compelling Respondent to serve answers to interrogatories or respond to Requests for Production that were submitted pursuant to Civil Rules 33 and 34. Petitioner/Wife further moves, pursuant to Rule 37(a)(4), to have Respondent/Husband pay the reasonable expenses, including attorneys' fees, incurred in obtaining this Order along with sanctioning Mr. Grossman by entering a default against him. Alternatively, if the court does not default Mr. Grossman, a monetary sanction of $1,000 per day for every day he has not submitted his

LAW OFFICES
MICHAEL W. BUGNI & ASSOC., PLLC
11300 ROOSEVELT WAY NE, STE. 300
SEATTLE, WA 98125
(206) 365-5500 • FACSIMILE (206) 363-8067

answers to the Petitioner should be assessed. In addition, Ms. Borodin should be granted the additional remedy of having the Husband pay all expert costs associated with the lateness of his discovery answers, including but not limited to requiring that Mr. Grossman pay 100% of CPA and expert costs incurred to prepare this matter for mediation/trial.

2. Grounds. Interrogatories and Requests for Production to Mr. Grossman were served through his attorney on April 5, 2010 (see **Exhibit 1**). The answers, responses and/or objections as provided in Rules 33 and 34 to the interrogatories and requests should have been returned no later than May 5, 2010. An extension was granted to May 17, 2010 at Mr. Grossman's request.

3. Basis. This Motion is based on the grounds stated above and the annexed declaration of counsel.

DATED: _______________

____
JENNIE R. LAIRD, WSBA#
Attorney for Petitioner/Wife

II. DECLARATION

JENNIE R. LAIRD, on oath, certifies and declares as follows:

1. I am the attorney of record for the Petitioner, Rabbi Jill Borodin, in this action and am competent to testify herein.

2. This dissolution proceeding has been extremely complex and litigious. As of May 7, almost 140 pleadings have been filed in the matter. The majority of the early stages of the case were consumed with issues of domestic violence perpetrated by Mr. Grossman, including incidents which compromised the safety of the children. Multiple hearings both in

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MICHAEL W. BUGNI & ASSOC., PLLC
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SEATTLE, WA 98125
(206) 365-5500 • FACSIMILE (206) 363-8067

the fall of 2009 and early spring of 2010 were held. Even after temporary orders were entered, parenting issues remained extremely contentious due to the Father's abusive use of conflict. On May 10, 2010, the parenting evaluator issued a report acknowledging the Father's problematic behavior.

3. Financial issues have also been extremely contested. Mr. Grossman has filed three motions seeking financial relief from Rabbi Borodin. At each of the hearings, the court recognized that Mr. Grossman, as a self-employed individual, had failed to provide proper financial documents which would allow the court to make informed rulings. On September 10, 2009, the Court issued a ruling which stated, "…the father did not comply with local rules re submission of financial documents; the court therefore makes this order without benefit of this information." (see **Exhibit 2**) Several months later, the court struck a motion filed by the father for failure to provide adequate financial documents with the following directive, "The Husband is prohibited from refiling until he has fully and completely complied with LFLR 10…" (see **Exhibit 3**)

4. Prior to marriage, the Husband was a successful Wall Street banker. During marriage, at community expense, the Husband earned his MBA at the Wharton School, University of Pennsylvania. Today, he self-manages two Hedge Fund partnerships (i.e Tanager Fund and Ptarmigan Fund). The Husband has produced documents that the Tanager Fund, as of late 2009, contained assets of about $1Million. (**Exhibit 4**) The Wife believes that the Ptarmigan Fund was funded with $400,000 in community cash, possibly more. (**Exhibit 5**) The Husband has never provided an accounting of any funds and has never

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SEATTLE, WA 98125
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disclosed the value of the Ptarmigan Fund which the Husband states. "reimburses me for some expenses, say $10,000." (See **Exhibit 6,** pg 1) The Husband has provided no monthly financial statements, no profit/loss statements, no partnership documentation, and no documentation for any loans from either the Tanager or Ptarmigan Funds. The Husband has openly stated that he has been taking "loans" from the fund, but has not provided evidence of loans. (see **Exhibit 6,** pgs 1-2) Regarding the loans, he has stated, "it is also true that on an amended return I may choose different elections (e.g., period shifting some income under the provisions of Advanced Payment of Services." He has also stated, "it is true that I cannot file accurate or technically compliant tax returns" but refused to provide underlying data for any business or personal financial matters. (See **Exhibit 6,** pg 2)

5. Two independent sets of Interrogatories and Requests for Production of Documents, copies of which are submitted as working copies only, were submitted to the Respondent, Adam Grossman, through his attorney of record, Carl T. Edwards, on April 5, 2010, pursuant to Rules 33 and 34 of the Washington State Court Rules. The First Set of Interrogatories were general questions regarding financial and parenting matters. Second Set of Interrogatories were exclusively seeking information as underlying verification and sources of payment of Mr. Grossman's personal expenses as set forth in his Financial Declaration.

6. Subpoenas were sent to Mr. Grossman's three companies on May 3, 2010. Responses were due May 13, 2010, but an extension was granted to May 17, 2010.

7. As previously stated, hundreds of thousands of dollars have been funneled out of the community and into "hedge funds" set up and managed by Mr. Grossman. Forensic

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MICHAEL W. BUGNI & ASSOC., PLLC
11300 ROOSEVELT WAY NE, STE. 300
SEATTLE, WA 98125
(206) 365-5500 • FACSIMILE (206) 363-8067

expert Steve Kessler was identified several months ago to commence a forensic investigation of deposits and withdrawals from Mr. Grossman's accounts, and to value the many businesses.

8. In early May, an extension of Mr. Grossman's interrogatory answers and subpoenaed responses was requested. **Exhibit 7** is a proposal from Mr. Grossman, through counsel, that he would deliver his client's responses by May 17, 2010. On Monday, May 17, Mr. Grossman, through counsel requested an exchange of discovery on the 18th. On May 18th, it was disclosed that Mr. Grossman had not completed discovery. **See Exhibit 8.**

9. Below is the discovery schedule agreed to by counsel:

May 10 – get Kelly Shanks report
May 17 – Exchange discovery responses
June 11 – Exchange mediation materials
Week of June 14 – Mediate (all conference rooms here are available Tues, Wed, Thurs of that week)
June 28 – Exchange witness and exhibit lists if we don't settle
July 12 – Trial
(See **Exhibit 9**)

10. In reliance on the agreed schedule, a new order has been entered continuing trial. Mediation has been scheduled for Thursday, June 17, with Justice Roselle Pekelis at $350 per hour. The above schedule was specifically negotiated to accommodate my absence from May 19-May 31 inclusive. Notice of my absence was delivered to counsel in April.

11. Getting Mr. Grossman's responses to financial discovery matters was essential prior to my departure. I needed to sift through the materials to determine what to send to forensic expert Steve Kessler for analysis and valuation of the community businesses. Mr.

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Grossman's failure to comply with even basic financial disclosure requirements going all the way back to September, 2009 has interfered with being able to prepare this matter for trial.

12. At this point, solely related to Mr. Grossman's actions, proper trial preparation is impossible. The only adequate remedy available to the court is to default Mr. Grossman on financial matters and allow the Wife to proceed with her evidence. Of particular note is that the court has issued two separate orders admonishing the Husband for failure to provide adequate financial information. He obviously has no regard for court orders. If the court does not default Mr. Grossman, sanctions must be consequential enough to get his undivided attention and motivate him to respond. The Wife proposes a daily sanction of $1,000 per day commencing May 17, 2010. This is a tiny fraction of the assets held by Mr. Grossman. In addition, Ms. Borodin should be granted the additional remedy of having the Husband pay all expert costs associated with the lateness of his discovery answers, including but not limited to requiring that Mr. Grossman pay 100% of CPA and expert costs incurred timely to prepare this matter for mediation/trial.

13. Attorneys' fees in the amount of approximately $1,575 are anticipated to prepare and respond to this motion (i.e. approximately 5 hours of attorney time, including but not limited to working with Mr. Edwards in creating a discovery schedule, preparing this motion and anticipated time to reply).

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MICHAEL W. BUGNI & ASSOC., PLLC
11300 ROOSEVELT WAY NE, STE. 300
SEATTLE, WA 98125
(206) 365-5500 • FACSIMILE (206) 363-8067

14. **Counsel's Certification Under CR 26(i):** Previously submitted as Exhibits in this matter is documentation as to the agreement of counsel evidencing that counsel have met and conferred regarding discovery matters.

I certify and declare under penalty of perjury under the laws of the State of Washington that the foregoing statement is true and correct.

DATED: ______________

____
JENNIE R. LAIRD, WSBA # 26513
Attorney for Petitioner/Wife

LAW OFFICES
MICHAEL W. BUGNI & ASSOC., PLLC
11300 ROOSEVELT WAY NE, STE. 300
SEATTLE, WA 98125
(206) 365-5500 • FACSIMILE (206) 363-8067

Honorable Samuel J. Steiner
Chapter 11
Hearing Date: November 12. 2010
Hearing Time: 9:30 a.m.
Hearing Place: Seattle, WA
Response Date: November 5, 2010

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

In re ADAM R. GROSSMAN, Debtor.	No. 10-19817-SJS MOTION FOR ORDER FOR DISGORGEMENT OF FEES

Jill Borodin ("Ms. Borodin"), a creditor herein, moves this Court for an order for disgorgement of fees of Emily Tsai for failure to comply with 11 U.S.C. §§327 and 2014.

I. Background

The Debtor and Ms. Borodin are parties to a dissolution proceeding currently pending in the Superior Court in King County Case Number 09-3-02955-9 SEA. The state court dissolution trial is set to commence on November 15, 2010.

The Debtor filed his Chapter 11 bankruptcy petition on August 19, 2010 (the "Petition Date"). The Debtor is represented by bankruptcy counsel. On or about September 16, 2010, after the Petition Date, the Debtor retained Emily Tsai to represent him in the upcoming dissolution trial. On or about the time of Ms. Tsai's engagement,

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720 Olive Way, Suite 1000, Seattle, WA 98101
P: 206-624-9894 F: 206-624-8598
www.crockerlaw.com

the Debtor paid Ms. Tsai a retainer of $7,500 with funds borrowed from friends and family members post-petition. See Declaration of Tereza Simonyan. Neither the Debtor nor Ms. Tsai has filed an application for approval of Ms. Tsai's employment as special counsel as required under 11 U.S.C. §§ 327(e) and 2014.

II. Legal Authority

Section 327(e) of Title 11 of the United States Code (the "Bankruptcy Code") allows the trustee in possession to employ a professional for a "specified special purpose" if such representation is in the best interest of the estate, and if such professional does not hold an interest adverse to the estate. 11 U.S.C. § 327(e).

In order to be paid for services rendered to the estate, professionals required to be employed under Section 327 of the Bankruptcy Code must first obtain court approval of their employment. *In re Weibel, Inc.*, 176 B.R. 209, 212 (B.A.P. 9th Cir. Cal. 1994). Federal Rule of Bankruptcy Procedure 2014 governs the procedures for obtaining approval of employment, and requires that the application contain specific facts disclosing to the bankruptcy court "the necessity for the employment, the name of the person to be employed, the reasons for the selection, the professional services to be rendered, any proposed arrangement for compensation, and, to the best of the applicant's knowledge, all of the person's connections with the debtor, creditors, any other party in interest, their respective attorneys and accountants, the United States trustee or any person employed in the office of the United States trustee." Fed. R. Bankr. Pro. 2014.

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720 Olive Way, Suite 1000, Seattle, WA 98101
P: 206-624-9894 F: 206-624-8598
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The detailed disclosure requirements under Fed. R. Bankr. Pro. 2014 are intended to divulge enough information to allow the Bankruptcy Court to evaluate whether the employment of the professional is in the best interest of the estate. *See, e.g., In re Begun*, 162 B.R. 168, 177 (Bankr. N.D. Ill. 1993).

The disclosure rules are applied strictly and literally, even if the results are sometimes harsh. *In re Park-Helena Corp.*, 63 F.3d 877, 881 (9th Cir. 1995) *citing, In re Plaza Hotel Corp.*, 111 B.R. 882, 883 (Bankr. E.D. Cal. 1990). Negligence or inadvertence do not vitiate the failure to comply with the rules. *Id.* Failure to comply with the disclosure requirements gives the court "broad authority to deny any and all compensation," order the disgorgement of all fees, *In re Lewis*, 113 F.3d 1040, 1045 (9th Cir. Cal. 1997), and may even result in sanctions "regardless of actual harm to the estate." *In re Park-Helena Corp.*, 63 F.3d at 881. Disgorgement for nondisclosure is appropriate "irrespective of the payment's source," *In re Lewis*, 113 F.3d at 1046.

III. Analysis

The court should order the disgorgement of all fees paid to Ms. Tsai to date in compensation for the professional services rendered to the Debtor due to the absence of a court approval of her employment.

No application for approval of Ms. Tsai's employment as Debtor's special counsel has been filed. Bypassing the requirement to obtain court approval for employment, the Debtor has failed to disclose vital factual information necessary for the

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720 Olive Way, Suite 1000, Seattle, WA 98101
P: 206-624-9894 F: 206-624-8598
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Bankruptcy Court to determine whether Ms. Tsai's employment is necessary and in the best interests of the estate. To date, virtually no information is available regarding the terms of Ms. Tsai's employment, and the amount of fees that have been, and are continuously being diverted from the Debtor's bankruptcy estate to Ms. Tsai. In addition, the Bankruptcy Court is still without knowledge whether Ms. Tsai has any connections with creditors or other parties of interest, or whether she holds interests adverse to the estate.

The Debtor is aware of the unambiguous disclosure requirements under Section 327 of the Bankruptcy Code and Fed. R. Bankr. Pro. 2014, and his disregard of the same appears to be deliberate. On September 28, 2010, during the 341 meeting of creditors, the Debtor was asked a set of questions regarding the employment of Ms. Tsai. The Trustee conducting the 341 meeting of creditors stated, on the record, that the employment of Ms. Tsai as special counsel would need to be approved by the court. Although the Debtor's counsel assured the trustee that the employment application was forthcoming, one has not been filed to this date. See Declaration of Tereza Simonyan.

The Debtor's failure to comply with the bankruptcy code requirements for pre-employment approval and the likelihood of disgorgement of fees has also been brought to the attention of Ms. Tsai. On October 10, 2010, two pleadings were filed in the Superior Court dissolution case in which Ms. Borodin, through counsel, informs Ms. Tsai of the procedures that must be followed before an attorney may receive compensation for fees

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720 Olive Way, Suite 1000, Seattle, WA 98101
P: 206-624-9894 F: 206-624-8598

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incurred in representing a bankruptcy debtor. See **Exhibit A and B** to the Declaration of Tereza Simonyan. Therefore, disgorgement is an appropriate remedy given that Ms. Tsai continues to accept payment of her fees post-petition, despite her knowledge that it is in violation of the Bankruptcy Code.

IV. Conclusion

Ms. Borodin, as a creditor in the current chapter 11 proceeding, requests an order directing Ms. Tsai to disgorge, within 14 days of entry of this order, the retainer in the amount of $7,500, and all other amounts paid by the Debtor to Ms. Tsai to date, to be held in the Court's registry, or any other safeguarded account, and not to be released until so further ordered by the Court.

DATED this 19th day of October, 2010.

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By *___/s/Tereza Simonyan___*
Shelly Crocker, WSBA #21232
Tereza Simonyan, WSBA #41741
Attorneys for Jill Borodin

CROCKER LAW GROUP PLLC
720 Olive Way, Suite 1000, Seattle, WA 98101
P: 206-624-9894 F: 206-624-8598
www.crockerlaw.com

Honorable Samuel J. Steiner
Chapter 11
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UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

In re ADAM R. GROSSMAN, Debtor.	No. 10-19817-SJS DECLARATION OF TEREZA SIMONYAN IN SUPPORT OF MOTION FOR ORDER FOR DISGORGEMENT OF FEES

Tereza Simonyan declares as follows:

1. I am one of the attorneys of record for Jill Borodin, a creditor in the above Chapter 11 case, and the person moving for an order disgorging the fees of Emily Tsai. I am over the age of 18 years, have personal knowledge of the facts stated herein, and am competent to testify to them.

2. On August 19, 2010 Adam R. Grossman ("Debtor") commenced a Chapter 11 bankruptcy proceeding.

3. On September 28, 2010, I attended the Debtor's 341 meeting of creditors and asked him a set of questions regarding his employment of Emily Tsai.

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P: 206-624-9894 F: 206-624-8598
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4. The Debtor stated that on September 16, 2010, he had retained Ms. Tsai to represent him in his dissolution proceeding pending in the Superior Court of Washington in King County Case Number 09-3-02955-9 SEA.

5. The Debtor stated that he had paid Ms. Tsai a retainer of $7,500, with funds that he had borrowed from friends and family members.

6. William Courshon, the attorney for the United States Trustee conducting the 341 meeting of creditors, informed the Debtor during the 341 meeting of creditors that the Debtor was required to have Emily Tsai's employment as special counsel approved by the Bankruptcy Court. The Debtor's bankruptcy counsel assured Mr. Courshon that he intended to comply with such requirement.

7. Attached as **Exhibit A** is a true and correct copy of the Legal Memorandum Supporting Motion to Quash filed in the state court dissolution proceeding on October 10, 2010.

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720 Olive Way, Suite 1000, Seattle, WA 98101
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8. Attached as **Exhibit B** is a true and correct copy of the Wife's Strict Reply in Support of Motion to Quash and for Other Relief filed in the state court dissolution proceeding on October 10, 2010.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

DATED this 19th day of October, 2010.

/s/Tereza Simonyan
Tereza Simonyan

CROCKER LAW GROUP PLLC
720 Olive Way, Suite 1000, Seattle, WA 98101
P: 206-624-9894 F: 206-624-8598
www.crockerlaw.com

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IN THE SUPERIOR COURT OF WASHINGTON
IN AND FOR KING COUNTY

In re the Marriage of: JILL IRINA BORODIN, Petitioner, and ADAM REED GROSSMAN, Respondent.	NO. 09-3-02955-9 SEA **TEMPORARY ORDER** **CLERK'S ACTION REQUIRED:** **Law Enforcement Notification,¶ 3.1**

I. JUDGMENT/ORDER SUMMARIES

1.1 RESTRAINING ORDER SUMMARY.

Does not apply

Restraining Order Summary is set forth below:

Name of person(s) restrained:	**ADAM GROSSMAN**
Name of person(s) protected:	**JILL BORODIN**
	~~**ALEXANDRA GROSSMAN**~~
See paragraph 3.1	~~**NAOMI GROSSMAN**~~

VIOLATION OF A RESTRAINING ORDER IN PARAGRAPH 3.1 WITH ACTUAL KNOWLEDGE OF ITS TERMS IS A CRIMINAL OFFENSE

LAW OFFICES
MICHAEL W. BUGNI & ASSOC., PLLC
11320 ROOSEVELT WAY NORTHEAST
SEATTLE, WA 98125
(206) 365-5500 • FACSIMILE (206) 363-8067

UNDER CHAPTER 26.50 RCW, AND WILL SUBJECT THE VIOLATOR TO ARREST. RCW 26.09.060.

YOU CAN BE ARRESTED EVEN IF THE PERSON OR PERSONS WHO OBTAINED THE ORDER INVITE OR ALLOW YOU TO VIOLATE THE ORDER'S PROHIBITIONS. THE RESPONDENT HAS THE SOLE RESPONSIBILITY TO AVOID OR REFRAIN FROM THE ORDER'S PROVISIONS. ONLY THE COURT CAN CHANGE THE ORDER UPON WRITTEN APPLICATION.

1.2 MONEY JUDGMENT SUMMARY.

Does not apply:

II. BASIS

A motion for a temporary order was presented to this Court and the Court finds reasonable cause to issue the order.

III. ORDER

It is *ORDERED* that:

3.1 RESTRAINING ORDER.

Previous Order:

The prior restraining order dated 8/14/09

is terminated, ~~and replaced by the following:~~

CLERK'S ACTION/LAW ENFORCEMENT ACTION.

This order shall be filed forthwith in the clerk's office and entered of record. The clerk of the court shall forward a copy of this order on or before the next judicial day, to the KING County Sheriff's Department, which shall enter this order into any computer-based criminal intelligence system available in this state used by law enforcement agencies to list outstanding warrants. **(A law enforcement information sheet must be completed by the party or the party's attorney and provided with this order before this order will be entered into the law**

LAW OFFICES
MICHAEL W. BUGNI & ASSOC., PLLC
11320 ROOSEVELT WAY NORTHEAST
SEATTLE, WA 98125
(206) 365-5500 • FACSIMILE (206) 363-8067

enforcement computer system.)

SERVICE.

☒ The restrained party or attorney appeared in court or signed this order; service of this order is not required.

EXPIRATION DATE.

This restraining order will expire in 12 months and shall be removed from any computer-based criminal intelligence system available in this state used by law enforcement agencies to list outstanding warrants, unless a new order is issued, or unless the court sets forth another expiration date here: .

FULL FAITH AND CREDIT.

Pursuant to 18 U.S.C. § 2265, a court in any of the 50 states, the District of Columbia, Puerto Rico, any United States territory, and any tribal land within the United States shall accord full faith and credit to the order.

VIOLATION OF A RESTRAINING ORDER IN PARAGRAPH 3.1 WITH ACTUAL NOTICE OF ITS TERMS IS A CRIMINAL OFFENSE UNDER CHAPTER 26.50 RCW, AND WILL SUBJECT THE VIOLATOR TO ARREST. RCW 26.09.060.

3.1.1 The Respondent, Adam Grossman, is restrained from disturbing the peace of the other party or of any child.

3.1.2 The Respondent Adam Grossman is restrained and enjoined from going onto the grounds of or entering the home, work place or school of the other party ~~or the day care or school of these children: Alexandra Grossman and Naomi Grossman,~~ except as specifically permitted for visitation transfers in the parenting plan entered on this date, for ~~the~~ transfers from preschool at the synagogue.

3.1.3 The Respondent Adam Grossman is restrained and enjoined from molesting, assaulting, harassing, or stalking Jill Borodin. (If the court orders this relief, the restrained person will be prohibited from possessing a firearm or ammunition under federal law for the duration of the order. An exception exists for law enforcement officers and military personnel when carrying department/government-issued firearms. 18 U.S.C. §

LAW OFFICES
MICHAEL W. BUGNI & ASSOC., PLLC
11320 ROOSEVELT WAY NORTHEAST
SEATTLE, WA 98125
(206) 365-5500 • FACSIMILE (206) 363-8067

925(a)(1).)

CLERK'S ACTION/LAW ENFORCEMENT ACTION.

This order shall be filed forthwith in the clerk's office and entered of record. The clerk of the court shall forward a copy of this order on or before the next judicial day, to the King County Sheriff's Department, which shall enter this order into any computer-based criminal intelligence system available in this state used by law enforcement agencies to list outstanding warrants. **(A law enforcement information sheet must be completed by the party or the party's attorney and provided with this order before this order will be entered into the law enforcement computer system.)**

SERVICE.

☒ The restrained party or attorney appeared in court or signed this order; service of this order is not required.

EXPIRATION DATE.

This restraining order will expire in 12 months and shall be removed from any computer-based criminal intelligence system available in this state used by law enforcement agencies to list outstanding warrants, unless a new order is issued, or unless the court sets forth another expiration date here: ______________.

FULL FAITH AND CREDIT.

Pursuant to 18 U.S.C. § 2265, a court in any of the 50 states, the District of Columbia, Puerto Rico, any United States territory, and any tribal land within the United States shall accord full faith and credit to the order.

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3.1.4 Further Restraints. The court orders additional restraints as follows:

3.1.4.1 Restrains or enjoins both parties from selling, harming, transferring, removing, encumbering, concealing or in any way disposing of any community property except in the usual course of business or for the necessities of life and requiring each party to notify the other of any extraordinary expenditures made after the order is issued. ~~This includes but is not limited to the funds Adam Grossman removed from the children's bank accounts;~~ Fidelity Investments account ending in #7955; Charles Schwab

Respondent restrained from ~~going to~~ entering premises of Congregation Beth Shalom except for transfers of the children at preschool and except when there are parent/teacher conferences and/or other ECC events involving parents. Respondent may also attend CBS when Petitioner is out of town on a non-driving holiday.

HG

LAW OFFICES
MICHAEL W. BUGNI & ASSOC., PLLC
11320 ROOSEVELT WAY NORTHEAST
SEATTLE, WA 98125
(206) 365-5500 • FACSIMILE (206) 363-8067

accounts in the name of Adam Grossman; *community* Cambridge Trust account ending in #1711; Chase account ending in #7065; PNC Creditpool account ending in #4721. Regarding the funds operated/managed by the Respondent, no major withdrawals of funds belonging to the parties shall be made absent specific order of the court, *or by agreement of the parties.*

3.1.4.2 Restrains or enjoins both parties from assigning, transferring, borrowing, lapsing, surrendering or changing entitlements of any insurance policies of either or both parties whether medical, health, life or auto insurance.

3.1.4.3 Orders the *funds the Respondent took from children's accounts* ~~Respondent to immediately produce the funds he withdrew from the children's bank accounts as follows: He shall immediately deposit the amount of $8,221.40 with the Law Office of Kevin Scudder, his attorney of record. These funds shall be deposited in an interest-bearing trust account established by Respondent's counsel's office. Proof of establishment of this fund shall be provided to Petitioner's attorney within three (3) business days of entry of this order. OR, the issue of the Respondent's draining $8,221.40 from the children's bank accounts, and his responsibility for reimbursing/replacing same, is reserved for trial or settlement.~~ *and placed into Charles Schwab accounts FBO each child to remain untouched.*

3.1.4.4 Restrains or enjoins both parties from withdrawing any monies from joint savings accounts or money market accounts, cashing any time certificates, treasury bills, notes, bonds or travelers checks or further affecting in any manner any and all negotiable instruments of value over $1,000 of either or both parties without the specific written approval of the other party.

3.1.4.5 Restrains or enjoins both parties from removing, borrowing against or withdrawing any proceeds or funds from IRA or deferred compensation accounts, including but not limited to VIP, profit sharing, retirement, pension, stock option, investment, 401(k), sick leave, savings or other similar employment related accounts without the specific written approval of the other party.

3.1.4.6 Restrains or enjoins both parties from incurring community debts or obligations without the specific written approval of the other party. ~~Major household repairs or household system repairs required under the term of this order shall be deemed community debts/obligations.~~

LAW OFFICES
MICHAEL W. BUGNI & ASSOC., PLLC
11320 ROOSEVELT WAY NORTHEAST
SEATTLE, WA 98125
(206) 365-5500 • FACSIMILE (206) 363-8067

3.1.4.7 Restrains or enjoins both parties from canceling or changing any credit cards on which the other party is authorized to make transactions or interfering with the other party's credit in any way.

3.1.4.8 Restrains or enjoins both parties from canceling or changing any cell phone, text messaging or other electronic communication service plans in any way that would affect the other party's access to and use of same without the other party's advance written consent. The Respondent Adam Grossman is specifically ordered to pay the AT&T cell account such that neither party's telephone numbers are interrupted or canceled. past due he represents this has been paid, he shall provide proof through counsel within one week.

From today each party pays their own cell phone charges.

3.1.4.9 Restrains or enjoins both parties from removing any furniture, furnishings or other items from the family residence/garage without the specific written approval of the other party or a court order.

3.1.4.10 Restrains or enjoins both parties from discussing these proceedings with any child of the parties or making any derogatory or alienating remarks about the other party to or in front of any child of the parties.

3.2 TEMPORARY RELIEF.

3.2.1 During the pendency of this action, ~~undifferentiated support shall be paid by the Respondent Adam Grossman, as follows:~~ debts shall be paid as follows; in the nature of support:

3.2.1.1 ~~Petitioner Jill Borodin shall contribute \$2,200 per month to Respondent~~ Adam Grossman, ~~who~~ shall ~~then~~, in the nature of support, pay the following household bills: First ~~and second~~ mortgage; ~~taxes/insurance for home; utility bills (heat, electric, water/sewer/garbage;~~ AT&T telephone/~~internet; cable; car insurance~~; and Citibank consolidated student loans. Respondent Adam Grossman shall timely pay these bills, and provide Petitioner Jill Borodin with proof of timely payment. Should he fail to pay, the Petitioner may seek and shall receive a judgment against Respondent for the funds, and may seek an Amended Temporary Order making other provisions for payment. Respondent Adam Grossman's payment of these bills is ordered as his "undifferentiated support;" this is not maintenance and shall not be taxable as such. Nonpayment of same may be enforceable by contempt.

\$2,706.22/M 20th of month

2706.22

LAW OFFICES
MICHAEL W. BUGNI & ASSOC., PLLC
11320 ROOSEVELT WAY NORTHEAST
SEATTLE, WA 98125
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3.2.1.2 Petitioner Jill Borodin shall timely pay, and provide Respondent with proof of timely payment of, the following bills: ~~daycare for the children~~; gardening and cleaning expenses for the home* (*as needed), exterminator fees; ~~children's swimming lessons~~; health insurance premiums for the family; ~~and~~ general maintenance of the home while she lives there. utilities for the home; the second mortgage; and taxes/insurance for home, and car insurance.

3.2.2 The parties shall comply with the Temporary Parenting Plan signed by the Court.

~~3.2.3 The Respondent is restrained and prohibited from interfering with the Petitioner's employment by speaking derogatorily about the Petitioner to her congregants.~~

3.2.4 Each party is immediately responsible for their own future debts whether incurred by credit card or loan, security interest or mortgage except as specifically ordered herein.

3.2.5 Responsibility for the debts of the parties as per paragraph 3.2.1, inclusive, above, and as follows:

3.2.5.1 Adam Grossman shall timely pay the following: Wells Fargo line of credit ending in #5544, on home he owned prior to marriage located on Strauss Lane in Reading, CA; Bank of America VISA ending in #0789; Bank of Commerce Equity ending in #3692; Citibank Student loans ending in #70; Citi Premier Pass ending in #4425; Discover Card ending in #0579; T Mobile outstanding bill account ending in #2406; AAA VISA ending in #3915; AAA VISA ending in #9714; MIT MasterCard (currently in dispute) ending in #7336; Sallie Mae student loans.

3.2.5.2 Jill Borodin shall timely pay the following: Bank of America VISA ending in #1809; American Express ending in #1001.

3.2.6 Personal property shall be used as follows:

3.2.6.1 Each party may drive the automobile in his or her possession.

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3.2.6.2 Adam Grossman shall manage the California rental home on Strauss Avenue in Reading, CA.

3.2.6.3 The Respondent ~~shall~~ May arrange a time, by agreement with the Petitioner, to retrieve his personal items which have been packed by the Petitioner and placed in the garage of the family home. The Petitioner may have a surrogate at the residence in her stead while Respondent picks up his items.

3.2.6.4 The Petitioner ~~shall~~ may make a list of major household items to submit to the Respondent. The parties shall designate items each prefers to have, with the goal of working out use of any such items on a temporary basis through counsel.

3.2.7 The father shall undergo a comprehensive mental health / psychological assessment for diagnostic purposes. The court appoints Dr. Marsha Hedrick for this purpose. Dr. Hedrick shall consult with the mother and at least one (1) other collateral contact named by the mother as part of the assessment, as well as any/all mental health treatment providers, counselors, or psychologists/psychiatrists who have treated Respondent Adam Grossman within the last three (3) years. The father shall sign any releases required to facilitate such collateral contacts. The father shall pay for this assessment.* The completed assessment, which should include testing results, diagnosis, summary of past/current treatment, and a recommendation for future treatment (if applicable), shall be released to counsel for both parties. Upon release of the assessment, the parties may agree to amend the Temporary Parenting Plan, or, if they cannot agree, either party may bring a motion on the family law motions calendar. * Payment reimbursement in same fashion is reserved for settlement or trial.

3.2.8 The court appoints ~~either~~ Kelly Shanks. ~~Jennifer Keilin, or Jennifer Wheeler~~ to perform a parenting evaluation regarding the parenting of Alexandra and Naomi Grossman, including the assertions made by both parents relevant to parenting the children, including the mother's assertions that the father has committed acts of domestic violence/abuse, that he may have mental health issues which impact his ability to safely parent the children, and the father's controlling and bizarre behaviors.* Any required retainer shall be paid 50% by each parent. The parties shall cooperate in getting the parenting evaluator installed on this case.
*As well as the father's allegations the mother has been violent.

3.2.9 Real Property. The family home shall be occupied by the Petitioner Jill Borodin.

Separate order appointing Ms. Shanks shall be entered by agreement within 2 weeks.

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3.3 BOND OR SECURITY.

Does not apply.

3.4 OTHER.

The financial provisions herein may be reviewable in the future, as the father did not comply with local rules re: submission of financial documents; the court therefore makes this order without benefit of his information. Additional time to obtain/submit financial docs was not requested.

The parenting plan entered today may also be reviewed after the psychological assessment is released as per this order.

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THIS IS A TEMPORARY ORDER PENDING FURTHER ORDER OF THE COURT, REQUIRING COMPLIANCE WITH THE RESTRAINING ORDERS AND PARAGRAPHS ABOVE.

Dated: 9/10/09

JUDGE/COURT COMMISSIONER
LORI K. SMITH

Presented by:
(A signature below is actual notice of this order.)

MICHAEL W. BUGNI & ASSOC., PLLC

JENNIE LAIRD, WSBA 26513
Attorney for Petitioner, Jill Borodin

JILL BORODIN
Petitioner

Copy Received, Approved for Entry and
Notice of Presentation Waived by:
(A signature below is actual notice of this order.)

KEVIN SCUDDER, WSBA # 19067
Attorney for Respondent, Adam Grossman

ADAM GROSSMAN
Respondent

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